

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

COMPUTE NORTH HOLDINGS, INC., *et al.*,¹

Debtors.

)
) **Chapter 11**
)
) **Case No. 22-90273 (MI)**
)
) **(Jointly Administered)**
) **Re: Docket No. 714**

**CERTIFICATE OF NO OBJECTION
REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER (I) EXTENDING THE TIME TO FILE NOTICES
OF REMOVAL OF CIVIL ACTIONS AND (II) GRANTING RELATED RELIEF**

Pursuant to the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned representatives of Compute North Holdings, Inc. and its affiliates (collectively, the "Debtors") certify as follows:

1. On December 20, 2022, the Debtors filed the *Debtors' Motion for Entry of an Order (I) Extending the Time to File Notices of Removal of Civil Actions and (II) Granting Related Relief* (the "Motion") [Docket No. 714].

2. The Motion was served on all parties receiving electronic notice in this case via ECF and on the parties set forth on the Certificate of Service of the Motion.

3. The deadline for parties to file a response to the Motion was January 10, 2022 (the "Objection Deadline"). More than 24 hours have passed since the Objection Deadline. Counsel

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors' service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

for the Debtors has reviewed the Court's docket and no objection/response to the Motion appears thereon. Counsel for the Debtors has not received any objection or response to the Motion, and is not aware of any such objection or response.

4. Attached hereto as **Exhibit A** is the proposed form of order granting the requested relief in the Motion (the "**Proposed Order**"). Attached hereto as **Exhibit B** is a redline of the Proposed Order reflecting non-substantive changes between the Proposed Order and the proposed order attached to the Motion.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, granting the relief requested in the Motion, and granting such other and further relief as the Court may deem proper.

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Respectfully submitted,

Dated: January 13, 2023
Houston, Texas

/s/ James T. Grogan III

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